UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF NORTH CAROLINA WESTERN DIVISION

Civil Action No. 5:21-CV-00491-BO

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PATRICK D. LANDS,)
Plaintiff,)
)
VS.	DECLARATION OF FAGAN STACKHOUSE (28 U.S.C. § 1746)
CITY OF RALEIGH, Defendants.	
)
)
)

Fagan Stackhouse, under penalty of perjury, declares and states as follows:

- 1. I am the Director of the City of Raleigh's Human Resources ("HR") Department and am the leader of that Department. I am over eighteen (18) years of age, and the information contained in this declaration is based on my personal knowledge.
- 2. The HR Department receives and processes requests for leave, including leave under the Family Medical Leave Act ("FMLA").
- 3. I am aware that Patrick D. Lands, a former City employee working in the Raleigh Police Department ("RPD") requested and was granted leave to care for his father under the FMLA, beginning on September 13, 2017.
- 4. The City has adopted policies in reference to sick leave and the use of leave under the FMLA. Exhibit 1 is a genuine copy of the City's Family/Medical Leave Policy, SOP 300-20, effective on August 5, 1993 and, which remained effective on November 25, 2019.
- 5. Exhibit 2 is a genuine copy of the City's Sick Leave policy SOP 300-11, effective on December 2, 2009.
- 6. Exhibit 3 is a genuine copy of the City's Human Resources Leave Policy 300-9A, effective as of June 29, 2018.

I declare under penalty of perjury that the foregoing is true and correct.

This the 25% day of January, 2022.

Fagan Stackhouse

Director, Human Resources Department

City of Raleigh

IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF NORTH CAROLINA WESTERN DIVISION

Civil Action No. 5:21-CV-00491-BO

PATRICK D. LANDS,)	
Plaintiff,)	
v.)	CERTIFICATE OF SERVICE
CITY OF RALEIGH,)	
Defendant.)	
)	

I hereby certify that on January 28, 2022, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system which will send notification of such filing to all counsel of record as shown below:

Valerie L. Bateman June K. Allison

NEW SOUTH LAW FIRM NEW SOUTH LAW FIRM

Email: yalerie@newsouthlawfirm.com Email: june@newsouthlawfirm.com

Respectfully submitted,

CITY OF RALEIGH

Robin L. Tatum, City Attorney

By: /s/ Alice Tejada

ALICE TEJADA

Senior Associate City Attorney

NC State Bar No. 23909

P.O. Box 590

Raleigh, NC 27602

Telephone: (919) 996-2004 Facsimile: (919) 996-7021

Email: Alice.Tejada@raleighnc.gov

ATTORNEYS FOR DEFENDANT CITY